

Unfortunately, neither Mike nor I can make it to the meeting on March 11-12, but I wanted to take the opportunity to repeat the comments I made earlier.

I am assuming that the purpose of a rating system is two-fold: It provides a means for the regulator to limit the scope of privileges in a predictable, enforceable and easily understood manner, and it serves as a means for potential clients to readily identify the organization's capabilities, and is therefore a useful marketing tool.

Based on the above, I see no purpose in having separating airframe and powerplant ratings for regular aircraft maintenance (as opposed to specialized "shop" type work such as engine overhaul or major structural repairs). I suggest that the "aircraft" ratings include the privilege of on-aircraft maintenance of engines, propellers, and avionics systems. Where necessary, the company manual can provide specific limitations. This would recognize that most maintenance organizations deal with the whole airplane. Engine, propeller and avionics ratings could then be reserved for specialized organizations that are equipped to undertake complete overhauls and other work of similar scope.

Once again, on the assumption that most maintenance organizations deal with the whole airplane, there is no point in separating aircraft ratings according to the kind of structure (i.e., composite vs. sheet metal). That could result in a repair station being prevented from performing systems related work, such as scheduled inspections and trouble shooting, just because they were not qualified to do structural repairs on the particular materials employed. Also, given that many ostensibly metal aircraft incorporate varying amounts of composite materials, there is also a potential problem in identifying at what point an aircraft becomes "composite."

If it is really felt necessary to address structural materials in the rating system, it may be worth considering the introduction of a structures rating, to permit the performance of "major" repairs to primary structure. Such a rating category could well be subdivided into sheet metal composite, steel tube and wooden ratings, for example, if desired.

I hope the above comments may be of some value.

Have a good meeting.

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